

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Mahmoud KHALIL,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State, and Pamela BONDI, in her official capacity as Attorney U.S. Department of Justice,

Respondents.

Case No. 25-cv-1935 (MEF) (MAH)

BRIEF IN SUPPORT OF
MOTION FOR LEAVE TO FILE
BRIEF AS *AMICI CURIAE* IN
SUPPORT OF PETITIONER’S
PETITION FOR WRIT OF HABEAS
CORPUS AND MOTIONS FOR
RELEASE, RETURN, AND A
PRELIMINARY INJUNCTION

Thirty-six New York and National Interfaith Groups (collectively “proposed *amici*”) respectfully move for leave to file the accompanying *amici curiae* brief in support of Petitioner Mahmoud Khalil. Petitioner consents to the filing of this *amicus* brief. On May 21, 2025, Counsel for Respondents informed proposed amici that Respondents do not take a position. No counsel for a party authored the accompanying *amici curiae* brief in whole or in part. Further, no person, other than amicus, their members, or their counsel contributed money intended to fund this brief’s preparation or submission.

Proposed *amici* respectfully submit this Court should grant them leave to file the proposed brief. Courts should grant a motion for leave to file an *amicus* brief when (1) the movant has an

“adequate interest” and (2) the accompanying brief is “desirable” and “relevant to the disposition of the case.” *Neonatology Assocs., P.A. v. C.I.R.*, 293 F.3d 128, 131 (3d Cir. 2002) (citing Federal Rule of Appellate Procedure 29(a)). These requirements should be “broadly interpreted” to allow leave to file amicus briefs unless “it is obvious” that the requirements are not met. *Id.* at 133. It is “preferable to err on the side of granting leave.” *Id.*

Proposed amici meet these requirements. First, they have a strong interest in the right of free expression under the First Amendment to the U.S. Constitution, as it is integrally bound to their constitutionally guaranteed free exercise of faith. Second, their proposed brief is desirable and relevant to this petition and the pending motions because it advances the concerns of Jewish faith leaders, along with their interfaith brothers and sisters, on the pretext of a fight against antisemitism as a justification for arrest, imprisonment and deportation.

List of Amici

The Beacon
Bend The Arc
Berkeley Zen Center
Buddhist Coalition for Democracy
Cece Jones-Davis
Congregation Beit Simchat Torah
Dai Bai Zan Cho Bo Zen Ji
Dharma Heart Zen
The Episcopal Diocese of Long Island
The Episcopal Diocese Of New York
Faithful America
First Spanish United Methodist Church (the People's Church), East Harlem
Heart Circle Zen
Hindus for Human Rights
HopeBuilds, LLC
Immigration Law & Justice New York
Interfaith Center Of New York (ICNY)
Jewish Center For Justice
Jikoji Zen Center
Masjid Al Haram

Mid-City Zen
New Birth Missionary Baptist Church
New Jewish Narrative
New York State Council on Churches
OKC First Church (Oklahoma City)
Pax Christi New York State
Presbytery Of New York City (PCUSA)
Religious Nationalisms Project
Riverside Church, New York
St. Ann & the Holy Trinity Episcopal Church
St. Mary's Episcopal Church, Harlem
T'ruah: The Rabbinic Call for Human Rights
UCC Movement for Palestinian Solidarity (UCC PIN)
Union Theological Seminary
Upaya Zen Center
Village Zendo

WHEREFORE, proposed amici respectfully requests that this Court grant its Motion for Leave to File its Amici Curiae Brief in Support of Petitioner's Motion for Preliminary Injunction.

Dated: May 21, 2025

Respectfully submitted,



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